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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

INTERNATIONAL MARKETS LIVE,
INC., a New York corporation dba
iMARKETSLIVE,

Plaintiff,

vs.

MATTHEW THAYER,

Defendant.

Case No.: 2:22-cv-00077-RFB-DJA

**STIPULATION AND ORDER FOR
EXTENSION OF TIME**

SECOND REQUEST

Defendant Matthew Thayer (“Defendant”), by and through his attorneys, and Plaintiff International Markets Live, Inc. dba iMarketslive (“Plaintiff”), by and through its attorney, hereby submit this second stipulation and order to continue the time needed to submit a stipulation to this Court on whether the Parties will need jurisdictional discovery or an evidentiary hearing pursuant to this Court’s Minute Order. *See* ECF No. 33; *see also* ECF No. 35.

This Court requested that the Parties provide this Court with a stipulation on or before June 13, 2022 regarding whether they will need jurisdictional discovery. The Parties have met and conferred several times to discuss whether they anticipate needing jurisdictional discovery and have exchanged limited information on the subject. On June 20, 2022, this Court granted the Parties first request for an additional week to allow Plaintiff to gather information regarding its jurisdictional arguments. *See* ECF No. 36. Such information is necessary before the Parties can appropriately inform this Court as to whether jurisdictional discovery will be needed. Plaintiff’s counsel has since

indicated that he has been unable to confirm applicable jurisdictional facts and will need an additional week to gather relevant facts.

The Parties therefore request and stipulate that this Court give the Parties an additional week to provide this Court with the requested stipulation. The Parties also to the request and stipulate that Defendant's deadline to file a response to the Amended Complaint be moved to July 5, 2022, Plaintiff's Opposition to any such responsive motion be moved to July 20, 2022, and Defendant's reply be moved to July 27, 2022.

The Parties are working cooperatively to gather relevant information related to jurisdiction. The Parties jointly request that the Court enter the following Order approving that Stipulation. This Stipulation is entered into in good faith and not for the purposes of delay.

DATED this 27th day of June, 2022.

DATED this 27th day of June, 2022.

McDONALD CARANO LLP

LAW OFFICES OF P. STERLING KERR

By: /s/ Tara U. Teegarden

By: /s/ George E. Robinson

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IT IS SO ORDERED.


RICHARD E. BOULWARE, II
United States District Court

June 27, 2022.
 DATED